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ADRIAN RISKIN

SUPERIOR COURT OF THE STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

CIVIL – UNLIMITED JURISDICTION

ADRIAN RISKIN,
Petitioner and Plaintiff,
vs.
DOWNTOWN LOS ANGELES PROPERTY
OWNERS ASSOCIATION, a non-profit
corporation,
Respondent and Defendant.

Case No.: BS174792

**PETITIONER'S OBJECTIONS TO
RESPONDENT'S DECLARATIONS,
EXHIBITS, AND OPPOSITION BRIEF**

**[Gov't Code § 6250, *et seq.* Civ. Proc. Code §
1085, *et seq.*]**

DATE: June 26, 2019

TIME: 9:30 A.M.

DEPT: 86

JUDGE: Hon. Mitchell L. Beckloff

1 Objection Number 1

2 Exhibit 1 – What purports to be blog printouts regarding Business Improvement Districts which
3 Respondent asserts is “general evidence of [Petitioner’s] abusive personality.”

4 **Grounds for Objection Number 1:** Irrelevant (Evid.C. §§ 350, 352; neither identity of requestor
5 nor purpose of request is relevant in CPRA proceedings [see *State Bd. of Equalization v. Superior*
6 *Court* (1992) 10 Cal. App. 4th 1177, 1191; *County of Los Angeles v. Superior Court* (2000) 82 Cal.
7 App. 4th 819, 826;]) Lack of personal knowledge (Evid.C. § 702(a)); Lack of authenticity (Evid.C.
8 §§ 1400, 1413); Foundation (Evid.C. § 403).

9 Objection Number 2

10 “I know Riskin brags about his true motive in inundating the Fashion District BID with CPRA
11 requests-‘I’m using the contents of their own records to terrorize them.’” (Leddy Decl., Para. 24,
12 33:27-34:1.)

13 **Grounds for Number Objection 2:** Irrelevant (Evid.C. §§ 350, 352; neither identity of requestor
14 nor purpose of request is relevant in CPRA proceedings [see *State Bd. of Equalization v. Superior*
15 *Court* (1992) 10 Cal. App. 4th 1177, 1191; *County of Los Angeles v. Superior Court* (2000) 82 Cal.
16 App. 4th 819, 826;]); Foundation (Evid.C. § 403); Hearsay (Evid.C. § 1200);

17 Objection Number 3

18 I know him to be abusive, dishonest, and he uses his michaelkohlhaas.org blog to insight [sic] others
19 like him to abuse the BID and its employees and Board Members. (Leddy Decl., Para. 24, 34:5-6)

20 **Grounds for Objection Number 3:** Irrelevant (Evid.C. §§ 350, 352; neither identity of requestor
21 nor purpose of request is relevant in CPRA proceedings [see *State Bd. of Equalization v. Superior*
22 *Court* (1992) 10 Cal. App. 4th 1177, 1191; *County of Los Angeles v. Superior Court* (2000) 82 Cal.
23 App. 4th 819, 826;]); Foundation (Evid.C. § 403); Hearsay (Evid.C. § 1200)

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1 Objection Number 4

2 "He has become increasingly abusive towards me and my staff, and in fact, one of my staff resigned,
3 one reason being that Riskin had posted abusive comments about her on his blog. (Leddy Decl.,
4 Para. 28, 35:25-27.)

5 **Grounds for Objection Number 4:** Irrelevant (Evid.C. §§ 350, 352; neither identity of requestor
6 nor purpose of request is relevant in CPRA proceedings [see *State Bd. of Equalization v. Superior*
7 *Court* (1992) 10 Cal. App. 4th 1177, 1191; *County of Los Angeles v. Superior Court* (2000) 82 Cal.
8 App. 4th 819, 826;]); Foundation (Evid.C. § 403); Hearsay (Evid.C. § 1200)

9 Objection Number 5

10 "I have Board members who will not deal with Riskin and have expressed concern that their and
11 BID staffs security is threatened by him." (Leddy Decl., Para. 28, 35:27-28.)

12 **Grounds for Objection Number 5:** Irrelevant (Evid.C. §§ 350, 352; neither identity of requestor
13 nor purpose of request is relevant in CPRA proceedings [see *State Bd. of Equalization v. Superior*
14 *Court* (1992) 10 Cal. App. 4th 1177, 1191; *County of Los Angeles v. Superior Court* (2000) 82 Cal.
15 App. 4th 819, 826;]); Foundation (Evid.C. § 403); Hearsay (Evid.C. § 1200)

16 Objection Number 6

17 "Just a few of Riskin's violence-inciting rhetoric, including concededly false accusations of racist
18 comments, demeaning and degrading caricatures of BID staff and Board Members, and general
19 evidence of Riskin's threatening personality, are attached as Exhibit 1." (Respondent's Opposition
20 Brief 6:fn1.)

21 **Grounds for Objection Number 6:** Irrelevant (Evid.C. §§ 350, 352; neither identity of requestor
22 nor purpose of request is relevant in CPRA proceedings [see *State Bd. of Equalization v. Superior*
23 *Court* (1992) 10 Cal. App. 4th 1177, 1191; *County of Los Angeles v. Superior Court* (2000) 82 Cal.
24 App. 4th 819, 826;]); Foundation (Evid.C. § 403); Hearsay (Evid.C. § 1200); Lack of authenticity
(Evid.C. §§ 1400, 1413).

25 DATED: June 10, 2019

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27 ABENICIO CISNEROS
28 Attorney for Petitioner